Mr. Van Kessler
Godfrey Conveyor Company, Inc.
4310 Middlebury Street
Elkhart, IN 46516

Re: **131-12414**
First Administrative Amendment to
Part 70 T 039-8962-00267

Dear Mr. Bawcum:

The Braun Corporation was issued a permit on March 31, 2000 for a fiberglass and aluminum boat manufacturing operation. A letter requesting to modify the source and increase capacity was received on April 11, 2000. The changes are as follows with deleted language as ~~strikeouts~~ and new language **bolded.** Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows:

1. The equipment list on page 4 has been revised to contain the new gel coat booths, chop stations and grinding booth capacity, as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) fiberglass application area located in Plant 6, consisting of **three (3)** ~~one (1)~~ gel coat booth**s**, identified as gel6-01, **gel6-02 and gel6-03, each** with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns ~~(HVLP-F)~~, and exhausting to three (3) ~~one (1)~~ stack**s**, identified as EF6-1, **EF6-12 and EF6-13**, and **thirteen (13)** ~~seven (7)~~ fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, ~~and~~ chop6-07, **cop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15**, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to **nine (9)** ~~six (6)~~ stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8 ~~and~~ EF6-9, **EF6-14, EF6-15 and EF6-16.**

(3) One (1) grinding booth, located in Plant 6, with a maximum capacity of **543** ~~450~~ pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to two (2) stacks, identified as EF6-2 and EF6-3.

2. The equipment list in Section D.1 has been revised to contain the new gel coat booths, chop stations and grinding booth capacity, as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) One (1) fiberglass application area located in Plant 6, consisting of **three (3)** ~~one (1)~~ gel coat booth**s**, identified as gel6-01, **gel6-02 and gel6-03, each** with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns ~~(HVLP-F)~~, and exhausting to three (3) ~~one (1)~~ stack**s**, identified as EF6-1, **EF6-12 and EF6-13**, and **thirteen (13)** ~~seven (7)~~ fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, ~~and~~ chop6-07, **cop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15**, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to **nine (9)** ~~six (6)~~ stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8 ~~and~~ EF6-9, **EF6-14, EF6-15 and EF6-16.**

(3) One (1) grinding booth, located in Plant 6, with a maximum capacity of **543** ~~450~~ pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to two (2) stacks, identified as EF6-2 and EF6-3.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

3. The new gelcoat booths and chop stations have been added to the Best Available Control Technology (BACT) determination for the Plant 6 fiberglass operations in Condition D.1.2 (c)(1) as follows:

(c) Pursuant to 326 IAC 8-1-6, Best Available Control Technology for the fiberglass application area located in Plant 6, shall be the following:

(1) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) VOCs for the fiberglass application area located in Plant 6, consisting of gel6-01, **gel6-02 and gel6-03** and chop6-01, **chop6-02, chop6-03, chop6-04, chop6-05, chop6-06**, ~~and~~ chop6-07, **cop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15** shall be less than 220 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

4. The facilities list on the Quarterly Reporting Form for VOC emissions from Plant 6 fiberglass operations on page 40 of 43 has been revised as follows:

Facility: gel6-01, **gel6-02 and gel6-03** and chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, ~~and~~ chop6-07, **cop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Patrick T. Brennan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PTB/MES
cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Godfrey Conveyor Company, Inc. (Godfrey Marine)
4310 Middlebury Street
Elkhart, Indiana 46516

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-8962-00267	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: March 31, 2000

First Significant Source Modification No. 039-12158	Pages Affected: 4, 30, 31, 40
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

First Administrative Amendment 131-12414	Pages Affected: 4, 30,31, 40
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary fiberglass and aluminum boat manufacturing operation.

Responsible Official:	Van Kessler
Source Address:	4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address:	4310 Middlebury Street, Elkhart, Indiana 46516
SIC Code:	3732
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) One (1) fiberglass application area located in Plant 6, consisting of three (3) gel coat booths, identified as gel6-01, gel6-02 and gel6-03, each with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns, and exhausting to three (3) stacks, identified as EF6-1, EF6-12 and EF6-13, and thirteen (13) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, cop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to nine (9) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8, EF6-9, EF6-14, EF6-15 and EF6-16.

(2) One (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of one (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns (HVLP-F), exhausting to one (1) stack, identified as EF9-1 and one (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.

(3) One (1) grinding booth, located in Plant 6, with a maximum capacity of 543 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to two (2) stacks, identified as EF6-2 and EF6-3.

(4) Four (4) woodworking machines, located in Plant 7, with a total maximum throughput of 729 pounds per hour, with one (1) cyclone for particulate matter control, exhausting to the atmosphere.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) One (1) fiberglass application area located in Plant 6, consisting of three (3) gel coat booths, identified as gel6-01, gel6-02 and gel6-03, each with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns, and exhausting to three (3) stacks, identified as EF6-1, EF6-12 and EF6-13, and thirteen (13) fiberglass chop stations, identified as chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, cop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15, each with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, all exhausting to nine (9) stacks, identified as EF6-4, EF6-5, EF6-6, EF6-7, EF6-8, EF6-9, EF6-14, EF6-15 and EF6-16.

(2) One (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of one (1) gel coat booth, identified as gel9-01, with a maximum capacity of 496 pounds of gel coat per hour, utilizing air-assisted airless spray guns (HVLP-F), exhausting to one (1) stack, identified as EF9-1 and one (1) fiberglass chop booth, identified as chop9-01, with a maximum capacity of 525 pounds of resin per hour, utilizing flowcoating, exhausting to one (1) stack, identified as EF9-2.

(3) One (1) grinding booth, located in Plant 6, with a maximum capacity of 543 pounds of flange material processed per hour, equipped with dry filters for particulate matter control, exhausting to two (2) stacks, identified as EF6-2 and EF6-3.

(4) Four (4) woodworking machines, located in Plant 7, with a total maximum throughput of 729 pounds per hour, with one (1) cyclone for particulate matter control, exhausting to the atmosphere.

(5) One (1) bilge painting process, located in Plant 6 in the general laminating department, utilizing one (1) air assisted airless spray gun (HVLP-F), with a maximum capacity of 21 units per hour, exhausting to one (1) stack, identified as EF6-9.

(6) One (1) insignificant degreasing operation that does not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD Rules) [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit VOCs is limited to less than 250 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase the potential to emit of VOCs or any other criteria pollutant to 250 tons per year or greater, from the equipment covered in this permit, shall require prior approval from IDEM, OAM before such change may occur.

D.1.2 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

(a) The one (1) bilge painting process, located in Plant 6 in the general laminating department, shall be limited to less than fifteen (15) tons of VOC per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 will not apply.

(b) The one (1) fiberglass application area used for the production of master boat molds, located in Plant 9, consisting of gel9-01 and chop9-01, shall be limited to less than ten (10) tons VOC per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 8-1-6 will not apply.

(c) Pursuant to 326 IAC 8-1-6, Best Available Control Technology for the fiberglass application area located in Plant 6, shall be the following:

(1) Use of resins and gel coats that contain styrene shall be limited such that the potential to emit (PTE) VOCs for the fiberglass application area located in Plant 6, consisting of gel6-01, gel6-02 and gel6-03 and chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, cop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15 shall be less than 220 tons per twelve (12) consecutive month period. Compliance with this limit shall be determined based upon the following criteria:

(A) VOC emissions from the application of gel coat and resins shall be calculated as volatile organic HAP emissions. Monthly usage by weight, weight percent content of all monomers that are volatile organic HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the HAP monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAM.

(B) The emission factors approved for use by IDEM, OAM shall be taken from the following reference: “Unified Emission Factors for Open Molding of Composites”, Composites Fabricators Associations, April 20, 1999, with the exception of the emission factors for controlled spray application. This reference is included with this permit. For HAP-emitting operations not addressed by this reference, emission factors shall be taken from U.S. EPA’s AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.

(2) The total monomer contents of all resins and gel coats used shall be limited to 35 percent (35%) by weight for resins, 37 percent (37%) by weight for gel coats or their equivalent on an emissions mass basis. HAP monomer contents shall be calculated on a neat basis, which means excluding any filler. Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis.

The use of resins with HAP monomer contents lower than 35%, gel coats with HAP monomer contents lower than 37%, and/or additional emission reduction techniques approved by IDEM, OAM, may be used to offset the use of resins with HAP monomer contents higher than 35%, and/or gel coats with HAP monomer contents higher than 37%. This is allowed to meet the HAP monomer content limits for resins and gel coats, and shall be calculated on an equivalent emissions mass basis as shown below:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Godfrey Conveyor Company, Inc. (Godfrey Marine)
Source Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Mailing Address: 4310 Middlebury Street, Elkhart, Indiana 46516
Part 70 Permit No.: T039-8962-000267
Facility: gel6-01, gel6-02 and gel6-03 and chop6-01, chop6-02, chop6-03, chop6-04, chop6-05, chop6-06, chop6-07, cop6-10, chop6-11, chop6-12, chop6-13, chop6-14 and chop6-15
Parameter: VOC
Limit: PTE less than 220 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC Usage/Emissons (tons/month)	VOC Usage/Emissions Previous 11 Months (tons)	VOC Usage/Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____